

1 TRACY L. WILKISON  
United States Attorney  
2 SCOTT M. GARRINGER  
Assistant United States Attorney  
3 Chief, Criminal Division  
ELI A. ALCARAZ (Cal. Bar No. 288594)  
4 Assistant United States Attorney  
Riverside Branch Office  
5 3403 Tenth Street, Suite 200  
Riverside, California 92501  
6 Telephone: (951) 276-6938  
Facsimile: (951) 276-6202  
7 Email: Eli.Alcaraz@usdoj.gov  
FRANCES S. LEWIS (Cal. Bar No. 291055)  
8 Assistant United States Attorney  
Deputy Chief, General Crimes Section  
9 312 North Spring Street, 11th Floor  
Los Angeles, California 90012  
10 Telephone: (213) 894-4850  
Facsimile: (213) 894-0141  
11 Email: Frances.Lewis@usdoj.gov

12 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
13

14 UNITED STATES DISTRICT COURT

15 FOR THE CENTRAL DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,  
17 Plaintiff,  
18 v.  
19 JOHN JACOB OLIVAS,  
20 Defendant.  
21

ED CR No. 18-231-JGB

JOINT STATEMENT OF THE CASE

Trial Date: November 30, 2021  
Time: 9:00 a.m.  
Place: Courtroom of the  
Hon. Jesús G. Bernal

22 Plaintiff United States of America, by and through its counsel  
23 of record, the United States Attorney for the Central District of  
24 California and Assistant United States Attorneys Eli A. Alcaraz and  
25 Frances S. Lewis, and defendant, John Jacob Olivas, by and through  
26 his counsel of record, Meghan Blanco, submit the following Joint  
27 Statement of the Case to be read to the jury in this matter.  
28

1       The parties respectfully request the opportunity to make  
2 modifications to this joint statement if necessary.

3 Dated: November 28, 2021

Respectfully submitted,

4 TRACY L. WILKISON  
United States Attorney

5 SCOTT M. GARRINGER  
6 Assistant United States Attorney  
Chief, Criminal Division

7 /s/ Frances S. Lewis

8 ELI A. ALCARAZ

9 FRANCES S. LEWIS

Assistant United States Attorneys

10 Attorneys for Plaintiff  
11 UNITED STATES OF AMERICA

12  
13 Dated: November 28, 2021

/s/ Meghan Blanco (w/ auth.)

14 MEGHAN BLANCO

15 Attorney for Defendant  
16 JOHN JACOB OLIVAS

**JOINT STATEMENT OF THE CASE**

The indictment in this case charges defendant John Jacob Olivas with three counts of deprivation of rights under color of law, in violation of Title 18, United States Code, Section 242.

Specifically, the United States alleges that at all relevant times Mr. Olivas was a Special Agent of United States Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"), formerly known as "ICE, Office of Investigations."

In Count One, the United States alleges that between August 2011 and January 2012, Mr. Olivas, while acting in his official capacity or purporting to act in his official capacity as an ICE special agent, willfully deprived victim K.L. of the right secured and protected by the Constitution and laws of the United States to be free from deprivations of liberty without due process of law, which includes the right to bodily integrity. Specifically, in or about January 2012, the United States alleges that Mr. Olivas attempted to engage in vaginal intercourse with K.L. without her consent and by using force against her, after communicating to K.L. that the police would not be responsive to any report she may make about Mr. Olivas because of his position as a federal law enforcement officer. This offense included attempted aggravated sexual abuse.

In Count Two, the United States alleges that, between March 2012 and September 29, 2012, Mr. Olivas, while acting in his official capacity or purporting to act in his official capacity as an ICE special agent, willfully deprived victim N.B. of the right secured and protected by the Constitution and laws of the United

1 States to be free from deprivations of liberty without due process  
2 of law, which includes the right of bodily integrity. Specifically,  
3 in or about September 2012, the United States alleges that Mr.  
4 Olivas engaged in vaginal intercourse with N.B. without her consent  
5 and by using force against N.B., after communicating to N.B. that  
6 the police would not be responsive to any report she may make about  
7 Mr. Olivas because of his position as a federal law enforcement  
8 officer. The offense included aggravated sexual abuse.

9 In Count Three, the United States further alleges that, between  
10 September 30, 2012 and November 2012, Mr. Olivas, while acting in  
11 his official capacity or purporting to act in his official capacity  
12 as an ICE special agent, willfully deprived N.B. of the right  
13 secured and protected by the Constitution and the laws of the United  
14 States to be free from deprivations of liberty without due process  
15 of law, which includes the right to bodily integrity. Specifically,  
16 on or about November 9, 2012, the United States alleges that Mr.  
17 Olivas engaged in vaginal intercourse with N.B. without her consent  
18 and by using force against N.B., after communicating to N.B. that  
19 the police would not be responsive to any report she may make about  
20 Mr. Olivas because of her position as a federal law enforcement  
21 officer. This offense included aggravated sexual abuse.

22 Mr. Olivas has pleaded not guilty to the charges and denies the  
23 allegations in the charges.  
24  
25  
26  
27  
28